

1 CAUSE NO. CC-17-06249-C
2

3 JINSUN, L.L.C., SILVER) IN THE COUNTY COURT

STAR HOLDINGS TRUST, TPH)

HOLDINGS, L.L.C., VERTICAL)

HOLDINGS L.L.C., STEVEN M.)

PLUMB, AND J. LEONARD)

IVINS,)

)

Plaintiffs,)

)

VS.) AT LAW NO. 3

)

ROTHSTEIN, KASS & COMPANY,)

PLLC,)

)

Defendant.)

OF DALLAS COUNTY, TEXAS

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15 REPORTER'S TRANSCRIPT OF PROCEEDINGS

16

JANUARY 9, 2020

17

18 Job No: 173986

19 On January 9, 2020, at 10:33 a.m., the
20 following proceedings came on to be heard in the
21 above-entitled and -numbered cause before Honorable
22 Judge Sally Montgomery (via telephone), held at the
23 offices of Brian Lauten, PC, 3811 Turtle Creek
24 Boulevard, Suite 1450, in the City of Dallas, County of
25 Dallas, State of Texas.

1 A P P E A R A N C E S

2

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1 P R O C E E D I N G S

2 THE COURT: Okay. Good morning.

3 MR. LAUTEN: Good morning.

4 THE COURT: Who's on the phone?

5 MR. LAUTEN: Your Honor, you've got Brian
6 Lauten, Tom Zaccaro, and Timothy Reynolds in my office.

7 We're in a deposition. I've got --

8 THE COURT: Slow down just a minute. This
9 is on the record. That's a little too quick.

10 All right. Brian Lauten. Who else?

11 MR. LAUTEN: Tom Zaccaro.

12 THE COURT: Keep going.

13 MR. ZACCARO: And Timothy Reynolds. We're
14 in the same room.

15 And I want to tell you, we have a court
16 reporter here taking a record. Is that okay, or do you
17 want her to stop typing?

18 THE COURT: Well, I've got my court
19 reporter taking the record right now too. No, I think
20 she should. She can probably hear better than Janet.

21 MR. LAUTEN: Okay.

22 MR. CARTER: Judge, Leon Carter here. I'm
23 in my office on behalf of Defendant Rothstein Kass, but
24 I'm in my office. I'm a little under the weather,
25 so -- I'm at the office.

1 THE COURT: What is your name?

2 MR. CARTER: Leon. This is Leon Carter.

3 MR. WOLF: Marquette Wolf also by remote.

4 THE COURT: And who else is on this call?

5 Anyone?

6 MR. CARTER: I think that's it.

7 THE COURT: Okay. What's going on today?

8 MR. LAUTEN: Judge, I'll try to be pretty
9 brief. So here's the issue. We have a scheduling
10 order in this case, and fact witness discovery closed
11 last month. We are feverishly deposing a bunch of
12 experts this month, including right now. We're in my
13 office producing my second expert this week for
14 deposition.

15 And this case is set for trial, as you
16 know, in March. My client, or the main principal in
17 one of my plaintiff entities, Kevin Casey, he's been
18 deposed twice in this case for an excessive amount --

19 THE COURT: What -- what is the name of
20 the motion that we're hearing? Do you have a motion
21 filed?

22 MR. LAUTEN: Yes, Your Honor. Last --
23 yesterday afternoon, I filed an emergency motion for
24 protective order, a motion for sanctions, and a motion
25 to show cause.

THE COURT: Okay. And so what's going on?

MR. LAUTEN: So earlier this week, the day before yesterday, Mr. Wolf was in my office producing one of our experts for deposition in this case, and the defense lawyer, Mr. Zaccaro -- my client, Kevin Casey, who has been deposed twice already, fact witness discovery is closed -- he attended the deposition.

And in the deposition, the defense lawyer served my client with a subpoena to give a deposition next week in another case where Rothstein Kass is being sued by the receiver.

My client is in Australia next week, but more importantly, this is an end run on your scheduling order that closed fact witness discovery.

They're trying to get more testimony through a different proceeding of my client, who knows absolutely nothing about the auditing malpractice that allegedly occurred in this different case, and it's in direct violation, we believe, to your order.

They're also trying to depose two other witnesses in that case who have already been deposed in the present case.

Meanwhile, in this other case, they have a -- the defendant has a pending motion to dismiss for 12(b)(6), which, if granted, they won't even have to

1 take depositions in that other case.

2 They don't even have a trial setting in
3 the other case. And they're trying to make us produce
4 our clients once again in violation of the scheduling
5 order in this case.

6 And we would ask the Court to grant
7 protection to stop them from doing that.

8 And there have been other things that
9 continue to happen that we believe are improper.

10 For example, they send process servers
11 into our experts' offices and had them served with
12 subpoenas, instead of going through us, even having
13 document production due on Christmas Eve when I was on
14 vacation.

15 We would ask the Court to grant protection
16 to stop them from trying to use a different proceeding
17 to get information that they can't get in this case
18 without seeking leave from your scheduling order.

19 I have offered --

20 THE COURT: Okay.

21 MR. LAUTEN: Go ahead.

22 THE COURT: Okay. Hang on. I would --
23 I'm going to let you respond, but I will say this, that
24 not one word can be asked of them regarding the facts
25 of this case without leave of the Court, either in

1 another matter or this matter.

2 MR. CARTER: Judge, this is Leon Carter on
3 behalf of Defendant Rothstein Kass.

4 The subpoenas for the depositions that
5 were served on the prospective deponents are in a
6 totally different case in the Northern District of
7 Texas, in Federal Court, in Judge Fitzwater's court.

8 And in that case, the plaintiff in that
9 case, Thomas L. Taylor, the Court-appointed receiver
10 for Breitling Energy Corporation, he listed all three
11 of the prospective deponents who we served with a
12 subpoena to take that deposition.

13 That plan in that Federal Court case in
14 Judge Fitzwater's court identified each one of them as
15 fact witnesses in that Federal Court case.

16 They want to take their depositions at
17 some point. They have not objected to the deposition.
18 They identified these people as persons with knowledge
19 of relevant facts.

20 We have simply indicated, in that
21 particular federal court action, we would like to take
22 that deposition as well.

23 THE COURT: Well --

24 MR. CARTER: We had asked Mr. Lauten time
25 and time again, does he represent these people, does he

1 represent these people. He never told us if he did.

2 Because we wanted to serve the appropriate person or
3 the appropriate attorney. He never told us he did.

4 But he's asking you to parse depositions
5 in a federal court action, which I don't think the
6 Court has power to do that.

7 MR. LAUTEN: Your Honor --

8 THE COURT: What he said was -- no, my
9 turn again.

10 What he said, though, is they're only --
11 it's a receiver, and I assume that the situation in
12 this case is part of that action, right?

13 MR. LAUTEN: Can I -- can I respond to
14 that, Judge?

15 THE COURT: No, not yet.

16 Since there are no deadlines in the other
17 case, I'm still not going to allow anyone to ask -- and
18 the federal case doesn't trump this situation,
19 especially if there are no deadlines -- doesn't trump
20 the scheduling order here.

21 You cannot ask them about anything that is
22 the subject of this case in these depositions until
23 after this case is completed -- trial is completed in
24 March. It's pretty quick.

25 Then you can ask them anything additional

1 that doesn't come out during the trial of this case.

2 MR. CARTER: I don't -- I don't understand
3 what the Court just said.

4 THE COURT: So what I'm saying is, there's
5 going to be a trial in this case in March, right?

6 MR. CARTER: In March, March 24th.

7 THE COURT: And a lot of information is
8 going to -- there's going to be a lot of testimony and
9 things like that.

10 So after this trial is concluded, that may
11 solve a lot of the need for depositions in the other
12 case if it deals with the assets that the receiver's
13 concerned with.

14 So if it's not then cleared up by the
15 trial of this case, then you're free to ask additional
16 questions, but it needs to be after the trial of this
17 case, which is March 24th.

18 MR. CARTER: So the Court did not say that
19 we cannot take these depositions? The Court is not
20 saying that it's prohibiting us in a separate federal
21 court matter from taking the depositions? You're not
22 saying that?

23 THE COURT: Yeah, I am, if they ask
24 anything that deals with the subject of this case, till
25 after March 24th, because it would not be efficient.

MR. WOLF: And, Judge, I think it's important -- this is Marquette -- that you hear what we've learned from the receiver to kind of really fill in the blanks that Mr. Carter left, because it -- it sounds -- what you're saying and what the receiver's attorney is saying sound very similar.

I think it's important for you to get a full understanding of exactly what's going on.

Brian has correspondence, I think recently, like today or last night --

Brian, can you share that with the judge?

MR. LAUTEN: Yes, Your Honor. I've got an email from this morning -- and I've handed Mr. Zaccaro a copy, and I'll make it -- I'll supplement the record with it -- it's an email from this morning, Your Honor, from the attorney for the receiver in the other case, where Mr. Zaccaro wants to depose my client next week.

And here's what the email this morning says: Brian - here is the scheduling order in the receiver's case (publicly available on PACER). There is no trial date. Discovery doesn't close until August 14th.

I found it strange that RK wanted to push these depos forward so quickly when (1) the Court has yet to rule on their 12(b)(6) motion to dismiss. (I've

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1 never had a federal court defendant agree to start
2 discovery prior to a ruling on their motion to dismiss,
3 let alone be the one pushing to start depos); Number
4 (2), the Court just issued the scheduling order at the
5 end of October; and (3), I had barely served RFPs on RK
6 after that and just got their response and document
7 production in December. They were actually trying to
8 schedule the three depos in December, but I pushed them
9 off because I was not ready.

10 That said, as a plaintiff's lawyer, I
11 always want to aggressively push a case forward, so I
12 agreed to these depo dates in January. But all of the
13 above made me feel that these depos were more geared
14 towards somehow affecting your case. (I don't know if
15 you are calling Wagers and Hoover live or not.)

16 Casey made no -- Casey's my client, Your
17 Honor -- quote, Casey made no sense since I have no
18 idea how his depo would be relevant in the receiver's
19 case.

20 That's the email from the receiver's
21 lawyer in the case where they want to depose my client,
22 Mr. Casey, next week, saying, I don't even know how
23 it's relevant.

24 MR. ZACCARO: Well --

25 MR. CARTER: And I can say this, Your

1 Honor. This is Leon Carter. Mr. Zaccaro might want to
2 add something.

3 But if -- if Mr. Lauten and Mr. Wolf want
4 to object to these depositions, the proper forum is
5 before Judge Fitzwater, because, as of today, neither
6 Mr. Wolf nor Lauten nor the receiver has objected or
7 filed any motion before Judge Fitzwater regarding our
8 efforts to take those depositions. No one has done a
9 thing in that regard.

10 And if you read -- I don't know if you've
11 had a chance to read Mr. Lauten's motion, but he has
12 cited no authority in their motion to support the
13 relief that they're requesting, none whatsoever.

14 He's making some -- some factual
15 allegations that we don't think, in whole or in part,
16 are accurate.

17 But he doesn't cite any authority that
18 gives this court, the state court, the authority to
19 prohibit us from taking depositions of fact witnesses
20 that have been identified in a related federal court
21 action, to preclude us from taking those depositions,
22 none whatsoever.

23 MR. ZACCARO: Your Honor, this is Tom
24 Zaccaro. You know, part of our concern here is that
25 we're doing this on an emergency basis without any

1 ability to submit any paperwork to the Court, any
2 briefs, any evidence, and the result of which is to
3 essentially stay our discovery in a different federal
4 court case.

5 Now we have Mr. Lauten reading an email
6 into the record. Well, there are lots of emails
7 relevant to this issue which we don't have the ability
8 to get before the Court because this motion was filed
9 yesterday afternoon, and here we are in the middle of a
10 deposition on the -- on the phone with you at -- at
11 10:45 in the morning.

12 Now, the fact of the matter is, in the
13 federal case, we have a whole deposition schedule, not
14 just the ones that we want to take, but -- but the ones
15 the receiver wants to take, and not just for these
16 witnesses that Mr. Lauten identified, but a whole
17 series of witnesses.

18 And the fact of the matter is --

19 THE COURT: Apparently -- apparently --
20 excuse me. But apparently the receiver doesn't want
21 these depositions right now.

22 MR. ZACCARO: That's not true. And, of
23 course, Mr. Lauten is just reading an email into the
24 record. There's lots of emails that tell the full
25 context of what's happening. We've agreed --

4 MR. ZACCARO: Well, Your Honor, in my
5 hand, no. I didn't even know --

8 MR. ZACCARO: Well, I don't have it with
9 me, but there's been a complete exchange of -- of email
10 correspondence with the receiver. I don't have them
11 because we've had no notice of this. We've had no
12 opportunity to --

13 THE COURT: All right. Well --

14 MR. ZACCARO: -- submit papers to the
15 Court.

21 MR. CARTER: The receiver could file an
22 objection to that or file some sort of motion, which
23 the receiver has not done, Judge.

24 THE COURT: I -- I understand. I
25 understand what you're saying, but I'm also curious

1 about this -- I have a right to be -- since it does
2 affect the parties in my case, and I don't want an end
3 run when it's not necessary and inefficient.

6 I'm not sure that I do have the ability to
7 stop depositions in a federal case. I'm pretty sure I
8 don't.

16 So you need to be honest with me and
17 yourself. You need to review your emails. And if the
18 receiver doesn't want them yet, you don't have --
19 you've got plenty of time to wait until after the trial
20 of this case. If this is all true what I'm hearing,
21 it's trouble.

22 MR. CARTER: It's what?

23 THE COURT: I don't have jurisdiction to
24 stop those depositions. I just want to be clear.

25 MR. ZACCARO: Your Honor, I also want to

1 point out, the two cases have the same core facts that
2 arise out of the same audit involving --

3 THE COURT: Good. If there's no need to
4 rush it, because you have plenty of time in the other
5 case, until after this trial, then don't rush it.

6 MR. ZACCARO: Well, Your Honor, I think we
7 need --

8 THE COURT: That's all I've -- that's all
9 I have to say. I'm done.

10 MR. ZACCARO: I appreciate that, your
11 Honor.

12 MR. CARTER: Okay.

13 MR. ZACCARO: Are you anticipating that we
14 would submit additional documents to you about
15 discovery in the other case, or should we just go
16 forward? I mean, I appreciate Your Honor's ruling --

17 THE COURT: I'm saying, I don't see, based
18 on what I'm hearing, that you need to go forward right
19 now in that other case on these issues.

20 It sounds like it's untimely what you're
21 doing and that it's really a way to get additional
22 discovery in this case, and it's unnecessary and
23 inefficient and costly. And I hope that doesn't turn
24 out to be the case, and I suggest you all talk to each
25 other.

1 And it does sound like you will need to
2 stop these depositions for Judge Fitzwater to hear
3 this; but in the meantime, this record is clear so he
4 can understand this Court's mind.

5 MR. LAUTEN: Can I say one more thing,
6 Your Honor?

7 THE COURT: What?

8 MR. LAUTEN: This morning --

9 THE COURT: Go ahead.

10 MR. LAUTEN: This morning, Rothstein Kass
11 filed a response to our emergency motion, and in that
12 response that was filed in your court this morning,
13 they put in there why they need to take my client's
14 deposition, and the reason they offer is a -- is the
15 very disputed issue about whether my clients owned this
16 piece of oil and gas property at the time of the
17 merger, which they actually asked my expert about two
18 days ago on the very day that the defense lawyer
19 subpoenaed my client for this deposition in my office.

20 MR. ZACCARO: Well --

21 MR. LAUTEN: So they've admitted in their
22 response that they want to depose Kevin Casey on the
23 very thing that they are trying to seek leave to depose
24 him on in this case.

25 MR. ZACCARO: And, Your Honor -- this is

1 Tom Zaccaro. Ownership of that asset is an issue in
2 the federal case. It's -- the receiver --

3 THE COURT: I don't need -- I'm not going
4 to go round and round, and I'm not going to play games,
5 and I'm not going to let you all play games. You all
6 need to be honest with each other.

7 And if these depositions can wait until a
8 timely fashion when the receiver is interested in them
9 and after the motion to dismiss has been heard -- if
10 they can wait -- and I'm going to be hearing from the
11 receiver -- this hearing will continue.

12 Right now, I'm going to take it under
13 advisement, and I'm going to assume it's going to be
14 filed in federal court, and that the record will be
15 used.

16 So y'all need to be straight with each
17 other, no games.

18 MR. CARTER: So you said what needs to be
19 filed in federal court --

20 THE REPORTER: I'm sorry? Mr. Carter,
21 could you repeat that, please.

22 MR. CARTER: Yeah, I apologize for not
23 saying who I was as well.

24 Judge, you're saying what's going to be
25 filed in federal court? The plaintiffs' motion to

1 quash? Is that what you're saying?

2 THE COURT: Sounds like it needs to be.

3 MR. CARTER: Okay.

4 THE COURT: I'm agreeing with you on that.

5 I don't think I have authority.

6 MR. CARTER: Okay.

7 THE COURT: But at the same time, I don't
8 like what I'm hearing, and if I did have authority, I
9 probably would stop these depositions.

10 MR. CARTER: I understand. Has the Court
11 had an opportunity to read our response that I filed
12 this morning?

13 THE COURT: I haven't had time to read
14 anything. I just got -- I've been in trial. I just
15 finished my last one.

16 MR. CARTER: Okay.

17 THE COURT: I can only -- I don't -- I'm
18 just saying, I already know that there's been a
19 tremendous amount of pressure applied that I felt was
20 inappropriate against plaintiffs' attorney relative to
21 all the discovery and not having it Bates-stamped and
22 organized and everything else, and I hope this is not a
23 continuation of the same.

24 MR. CARTER: And I don't think it is,
25 Judge. I know it's not.

THE COURT: Well, I'm just saying, I don't know, and I hope it's not true, and I plan to probably be hearing from the receiver later about the timing of this and the question of that.

MR. CARTER: Okay.

THE COURT: So hopefully there won't be any games, but in the meantime I don't think I have jurisdiction.

MR. CARTER: Well, I think the point --
okay. I agree with that, Judge. I think the point
that I want to make -- the final point -- and I think
Mr. Lauten will have to agree with this -- we have been
trying for some time now to find out if Mr. Lauten
represented one or more of these witnesses --

THE REPORTER: I'm having trouble hearing again.

MR. WOLF: Judge, let me speak to that.
Let me just -- I can clear all of this up.

THE COURT: We're getting a little back-feed going.

Okay. Mr. Wolf, proceed.

MR. WOLF: Yeah, to be more efficient and put this thing to bed, we can facilitate getting these depositions done sometime in May or June, months before

1 the close of discovery in that case.

2 That way, the defendants know they're
3 going to get whatever depositions they want in that
4 case without perfecting an end run on the order that
5 you've issued in this case.

6 There's no hurry, as I understand it from
7 looking at PACER, and if all they want is their
8 depositions, and it's truly not an effort to circumvent
9 a state court order, then there should be no harm in
10 waiting.

11 THE COURT: That is --

12 MR. WOLF: And I will say this, while you
13 may not have jurisdiction to stop a deposition in
14 federal court, you have jurisdiction over these lawyers
15 if they pull an end run around to circumvent your order
16 in this case.

17 THE COURT: I believe that's what I just
18 said. I believe that's what I just said. So just be
19 sure that there are no games on this.

20 MR. CARTER: And, Judge, we're not going
21 to play games. I think you know me and most of the
22 attorneys on this phone have known me for a while. I'm
23 still trying to get my head around how an end run if
24 we're trying to take the deposition in a federal court
25 action that is still pending --

1 THE COURT: Mr. Carter, it's real obvious
2 to me, okay?

3 MR. CARTER: It is?

4 THE COURT: It's very obvious to me
5 because there's just no need for these right now. It's
6 a waste of time right now because of the fact that
7 there will be a trial where everything will be blanched
8 out in March, and we just don't need them until after
9 that time. So it's --

10 MR. CARTER: So you're saying that we
11 don't have the permission that we need, we need to find
12 out after and not before the trial?

19 MR. CARTER: All right. I don't think
20 inefficient makes it improper. It might be inefficient
21 from your vantage point, but I don't think that makes
22 it improper.

23 THE COURT: I think it makes it improper
24 if you're doing things out of sync from the way they're
25 normally done, for example, the hearing on the

1 motion to dismiss.

2 MR. ZACCARO: Well, your Honor --

3 THE COURT: I'm just saying, be sure this
4 is not going on, because if this is going on and I hear
5 from the receiver, there will be consequences later.

6 Be sure you're doing -- you're being aboveboard on
7 this. I have concerns about it.

8 MR. LAUTEN: And if the Court grants their
9 motion to dismiss, they won't need a single deposition
10 in the other case, and that's pending.

11 THE COURT: I'm way ahead of you.

12 MR. LAUTEN: Yeah.

13 THE COURT: I've been doing this for 23
14 years.

15 MR. LAUTEN: I understand, Judge.

16 THE COURT: I've given a warning, and I've
17 got this record, and we'll see what happens.

18 MR. ZACCARO: Well, Your Honor, this is
19 Tom Zaccaro. You know, the suggestion is that there's
20 no need to take the discovery now in the federal case.

21 You know, the receiver has asked us to
22 consider settlement of that case, and part of the
23 reason for these depositions is to assess issues
24 relevant to settlement, including statute of
25 limitations.

1 That's the main reason we wanted to take
2 these depositions now, to see if -- if we should
3 entertain this -- the receiver's request and entrees to
4 us for settlement. That's why we're trying to take
5 these depositions.

6 What assets the receiver owns, including
7 the oil and gas fields that Mr. Lauten referred to, is
8 highly relevant to that inquiry, and the witnesses'
9 knowledge, as laid out -- as we will lay out in that
10 case, is relevant to a lot of issues, including statute
11 of limitations. That's why we were intending to take
12 these depositions.

13 Now, we can delay all that and delay the
14 settlement discussions, but so the Court is clear, the
15 reason why these depositions were timed for when they
16 were was mostly to evaluate and entertain the
17 receiver's request to us that we consider a settlement
18 of that case.

19 So there is no gain here. There is no
20 gain here.

21 THE COURT: It sounds like the receiver --
22 it sounds like the receiver wasn't prepared for these
23 right now either.

24 MR. ZACCARO: Well, I think -- we'll
25 submit the full record to the Court, and the Court will

1 see that the receiver agreed to these depositions and
2 is going to oppose an effort to -- to delay them.

3 But we'll have the receiver opine on that
4 and advise the Court.

5 THE COURT: Okay.

6 MR. LAUTEN: That's not true.

7 THE COURT: Well, I've made myself clear,
8 so carry on. Let me know what happens.

9 MR. CARTER: Thank you for your time.

10 MR. LAUTEN: Thank you, Judge.

11 THE COURT: You're welcome.

12 (Proceedings concluded at 11:00 a.m.)

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1 CAUSE NO. CC-17-06249-C
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3 JINSUN, L.L.C., SILVER) IN THE COUNTY COURT

STAR HOLDINGS TRUST, TPH)

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VS.) AT LAW NO. 3

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ROTHSTEIN, KASS & COMPANY,)

PLLC,)

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Defendant.)

OF DALLAS COUNTY, TEXAS

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15 REPORTER'S CERTIFICATE
16

17 I, Therese J. Casterline, Certified Shorthand
18 Reporter in and for the State of Texas, certify that
19 the foregoing proceedings were reported
20 stenographically by me at the time and place indicated.

21 I further certify that I am neither counsel
22 for, related to, nor employed by any of the parties or
23 attorneys in the action in which this proceeding was
24 taken, and further that I am not financially or
25 otherwise interested in the outcome of the action.

Page 28

1 Given under my hand on this the 10th day of
2 January, 2020.

3

4

5 *Therese Casterline*

6

7 Therese J. Casterline, Texas CSR
8 5001, Expiration Date: 4/30/22
9 Firm Registration No. 615
10 TSG Reporting - Worldwide
11 747 Third Avenue
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